## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

	§	
IBALDO ARENCIBIA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	<b>Civil Action No. 4:20-cv-00819-O</b>
AGA SERVICE COMPANY d/b/a	§	
ALLIANZ GLOBAL ASSISTANCE,	§	
AMERICAN AIRLINES, INC., and	§	
JEFFERSON INSURANCE COMPANY,	§	
	§	
Defendants.	§	
	§	

## AMERICAN AIRLINES, INC.'S MOTION TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT

Defendant American Airlines Inc. ("American") respectfully submits this motion to dismiss Plaintiff Ibaldo Arencibia's Amended Class Action Complaint [Dkt. No 82-1] (the "Amended Complaint") under Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim. The grounds for this motion are set forth in the accompanying brief in support of American's Motion to Dismiss Plaintiff's Amended Complaint.

American hereby incorporates by reference in this Motion all of the material set forth in its accompanying Brief in Support of American's Motion to Dismiss, and asks the Court (i) to order that the Complaint be dismissed with prejudice, and (ii) for such other and further relief as the Court deems just and proper.

Dated: October 23, 2020

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/s/ Dee J. Kelly, Jr.

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Counsel for Defendant American Airlines, Inc.

## **CERTIFICATE OF SERVICE**

I certify that on October 23, 2020, a true and correct copy of the foregoing document was electronically filed through the Court's CM/ECF system and served via CM/ECF on all registered counsel.

/s/ Dee J. Kelly, Jr.

Dee J. Kelly, Jr.